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**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Application of Pacific Gas and Electric
Company to Revise Its Electric Marginal
Costs, Revenue Allocation, and Rate Design.

(U 39 M)

Application 19-11-019
(Filed November 22, 2019)

**REPLY OF PACIFIC GAS AND ELECTRIC COMPANY
TO PROTESTS AND RESPONSES TO APPLICATION 19-11-019**

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Dated: January 21, 2020

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Pursuant to Rule 2.6 of the Commission's Rules of Practice and Procedure, Pacific Gas and Electric Company (PG&E) submits its reply to the protests and responses received regarding its Application in the above-referenced proceeding, commonly known as PG&E's 2020 General Rate Case (GRC) Phase II.

Fourteen joint or separate protests and responses were filed.^{1/} Two of these filings raised issues that PG&E believes are outside the scope of this proceeding. These issues are addressed in Section I, below. In Section II PG&E provides an overview of issues raised that are within the scope of the proceeding, but that warrant clarification or comment. In Sections III and IV, PG&E addresses the proposed categorization and need for hearings. In Section V, PG&E addresses Schedule. PG&E looks forward to the Prehearing Conference (PHC) scheduled for this Thursday January 23, 2020.

^{1/} These fourteen filings were made by the following parties on or before the January 10, 2020 deadline: Agricultural Energy Consumers Association (AECA), California Farm Bureau Federation (CFBF), California Public Advocates Office (CalPA), California Solar and Storage Association jointly with California Energy Storage Alliance and OhmConnect, Inc. (collectively CALSSA), the Center for Accessible Technology (CforAT), the County of Santa Clara (CSC), a coalition of Community Choice Aggregation (CCA) parties, namely: East Bay Community Energy, Marin Clean Energy, Peninsula Clean Energy, Pioneer Community Energy, San Jose Clean Energy, Silicon Valley Clean Energy, and Sonoma Clean Power (collectively Joint CCAs), Energy Producers and Users Coalition (EPUC), the Direct Access Customer Coalition (DACC), Merced and Modesto Irrigation Districts (MMID), Small Business Utility Advocates (SBUA), the Solar Energy Industries Association (SEIA), and The Utility Reform Network (TURN).

I. ISSUES THAT ARE OUT OF SCOPE

A. Proposed Scope of Issues

At page 22 of its Application, PG&E set forth the following recommended key issues:

1. Are PG&E's marginal cost proposals reasonable and should they be adopted?
2. Are PG&E's revenue allocation proposals reasonable and should they be adopted?
3. Are PG&E's rate design proposals reasonable and should they be adopted?
4. Are PG&E's proposed updated gas and electric Baseline quantities reasonable and should they be adopted?
5. Are PG&E's proposed updated service fees for Direct Access (DA) and Community Choice Aggregation (CCA) customers, filed in compliance with D.13-04-020, reasonable and should they be adopted?
6. Are PG&E's other proposals set forth in testimony reasonable, and should they be adopted?

All but two of the issues raised in the various parties' protests generally identify various marginal cost, revenue allocation and rate design issues that appear to fall squarely within the above-listed scope of issues, and no party has contested that any of these issues should not be adopted in the upcoming Scoping Memo.

Only one party, the Joint Community Choice Aggregators' (Joint CCAs) Protest (at page 10), expressly requested that a new issue be added to this list. Namely, the Joint CCAs suggest the addition of the following general issue: "Should the marginal cost, revenue allocation, and rate design proposals and policies put forth by other parties' [sic] be adopted in place of, or in addition to, those from PG&E." While at first blush this may not seem objectionable, PG&E believes it is both overbroad and unnecessary. For one thing, since the specifics of other parties' proposals are currently largely unknown, the formulation of this issue could be seen as a overbroad and too open-ended. Rather, PG&E believes that the opportunity for the CPUC to adopt other parties' alternative proposals is implicit in the issues as already defined above;

indeed PG&E's formulation of the issues builds upon previously-approved GRC Phase II issue formulations. If an intervening party convinces the CPUC that PG&E's proposals on marginal cost, revenue allocation and rate design are not reasonable and should not be adopted in full or in part, but rather that its alternative proposal(s) would be more reasonable to adopt, the CPUC not only can, but in the past has, adopted other parties' variations under the banner of the type of substantive issue formulations already set forth above. It is simply not necessary to add a separate issue line-item for other parties' proposals as long as those proposals are on the topics already found to be within scope.

Therefore, as discussed below, PG&E expects that all but two of the matters raised in these Protests will be addressed in the ordinary course of litigation, and PG&E will respond to parties' substantive positions in its rebuttal testimony.

B. Specific Issues that PG&E Requests be Found to be Out-of-Scope

1. CFBF's Suggestion that the CPUC Consider a PSPS Adjustment to Agricultural Rates Should be Ruled Out-of-Scope for PG&E's 2020 GRC Phase II

Although most of the issues raised in CFBF's protest fall within the marginal cost, revenue allocation and rate design issues set forth in PG&E's Application, one issue raised by CFBF is inappropriate and outside the scope of this proceeding.

CFBF's Protest, filed January 9, 2020, at page 2, indicates it is likely to propose rate design adjustments for customers who are subjected to Public Safety Power Shut-Off (PSPS) events in order to mitigate potential impacts on customers' pumping load. CFBF is concerned that agricultural customers may shift irrigation pumping load into high cost TOU periods after losing power or in anticipation of loss of power from a PSPS event.

PG&E opposes CFBF's apparent position that rate design adjustments for customers who experience a PSPS event should be in scope for this 2020 GRC Phase II. This topic involves policy questions for PSPS-related requirements, standards, implementation and customer impacts. One does not reach CFBF's rate adjustment question until policy issues involving

PSPS, its implementation, the impact on customers, and the utility's rights and obligations under its tariffs are decided. For instance, the Commission initiated Rulemaking 18-12-005 (December 19, 2018, known as the PSPS Rulemaking), with the goal of refining the practice of de-energization to "ensure it enhances public safety while minimizing unintended consequences."^{2/} Since then, the CPUC has issued a Phase I decision in R.18-12-005 with respect to communication and notification protocols,^{3/} and has opened a second phase to address additional aspects of PSPS processes and practices.^{4/} The CPUC has also indicated that it will address issues raised by interested parties with regard to utility de-energization plans during the course of this rulemaking.^{5/} In addition, the Commission initiated a companion proceeding, Order Instituting Investigation (OII) 19-11-013 to consider PSPS events in late 2019, with a Phase I scope that includes procedures for communication and/or notification procedures.^{6/}

While the PSPS Rulemaking and the OII proceedings remain pending, the idea of PSPS-related rate design adjustments should be deemed out-of-scope for PG&E's 2020 GRC Phase II.

2. DACCs's Suggestion to Consider Costs that may be Inappropriately Collected in the Distribution Rate Component is a GRC Phase I issue and Should be Ruled Out-of-Scope for PG&E's 2020 GRC Phase II

The Direct Access Customer Coalition (DACC) recommends that the Commission include in the scoping memo the "consideration of costs that may be [sic] collected in inappropriate rate components," including costs currently collected in distribution that would be more appropriately collected through the generation rate.^{7/} It is unclear whether or not DACC is referring to distribution costs authorized in GRC Phase I, or in some other proceeding. However,

^{2/} See R.18-12-005, p. 3.

^{3/} See D. 19-05-042, p. 130, A1-A20.

^{4/} See D.19-04-042 (June 4, 2019), Assigned Commissioner's Phase 2 Scoping Memo and Ruling (Aug. 14, 2019).

^{5/} See, e.g., CPUC Decision 19-05-037 (June 4, 2019), at p. 28: "Most of the issues raised by parties with regard to PG&E's proposal on de-energization . . . will be addressed in the de-energization Rulemaking, R.18-12-005."

^{6/} I. 19-11-013, p. 6.

^{7/} DACC Response, p. 2.

PG&E's proposed respective revenue requirements for Electric Distribution and Electric Generation were presented in the Test Year 2020 GRC Application of PG&E, filed on December 13, 2018 (Phase I),^{8/} where they are assigned to either distribution or generation. The Joint CCAs disputed and litigated PG&E's proposed allocation between electric distribution and generation in Phase I of PG&E's 2020 GRC.^{9/} Indeed, PG&E and the Joint CCAs continue to litigate this issue as of the filing date of this Reply to Protests.^{10/} Once assigned to either generation or distribution in the final decision in PG&E's 2020 GRC Phase I, reassignment of those costs in Phase II would be out-of-scope.

II. ISSUES WITHIN SCOPE THAT MERIT COMMENT OR CLARIFICATION

A. Protest of AECA

AECA generally identifies various marginal cost, revenue allocation and rate design issues, including issues relating to a ratemaking adjustment or other appropriate mechanism to address AECA's concerns about sales forecasting for the agricultural class,^{11/} which, according to AECA, appear to fall squarely within scope of issues PG&E already identified for this proceeding. AECA footnote 5 indicates that the matter of where agricultural sales forecasting should be considered will be determined in PG&E's pending ERRR proceeding A.19-06-001. However, a final decision in that case has yet to be issued.

In the ERRR proceeding, PG&E has agreed that AECA can file such a proposal in its GRC Phase II. If the final ERRR decision confirms this understanding, PG&E will respond through its Rebuttal testimony to the proposals AECA makes in its Responsive testimony.

AECA provided no comment at this time regarding PG&E's proposed schedule.

^{8/} Application (A.) 18-12-009, p. 6.

^{9/} A.18-12-009, Hearing Exhibit 216, Prepared Direct Testimony of Joseph A. Mancinelli and Andrew J. Reger on behalf of the Joint Community Choice Aggregators, July 26, 2019, pp. i-ii, p. 5.

^{10/} The Joint CCAs filed their Opening Brief in A.18-12-009 (PG&E's GRC Phase I) on January 6, 2019, and PG&E has not yet filed its Reply Brief as concurrent Reply Briefs are not due until January 27, 2020.

^{11/} CFBF Protest, p. 2.

B. Protest of CFBF (on matters other than PSPS)

Aside from the PSPS issue, which, as discussed in section I.B.1. above should be ruled out-of-scope, CFBF's Protest identifies many other matters that generally fall within the marginal cost, revenue allocation and rate design issues set forth in PG&E's Application. CFBF notes that its review of this Application is in the beginning stages and looks forward to PG&E's planned update testimony to reflect its adopted 2020 sales forecast and marginal generation costs after the implementation of PG&E's Annual Electric True-up (AET). Although there is still uncertainty about the timing of a final decision in PG&E's pending 2020 Energy Resource Recovery Account (ERRA) proceeding (A.19-06-001) and approval of PG&E's 2020 sales forecast, PG&E intends to serve its update testimony by May 1, 2020, regardless of whether the new sales forecast is implemented into rates on March 1, 2020.

CFBF generally accepts PG&E's proposed schedule but notes that Public Participation Hearings (PPH) should be added to it during the course of this proceeding, as discussed in section V. below.

C. Protest of CalPA

CalPA's Protest (at pages 1 – 7) identifies a wide range of substantive issues of interest to it, all of which appear to fall within the marginal cost, revenue allocation and rate design issues set forth in PG&E's Application. PG&E will respond to discovery requests and will address CalPA's proposals in its Rebuttal testimony in due course.

As discussed below in section V.B., CalPA supports PG&E's request to consolidate the Essential Use Study (EUS) plans from each of the investor-owned utilities (IOUs) into a separate track for consideration in the Affordability OIR (R.18-07-006), as this would be most efficient given that the IOUs' EUS plans contain a similar scope of issues that should be reviewed and decided together. CalPA notes that consolidation would allow interested parties to participate in a single proceeding rather than needing to advocate for EUS issues in three separate IOU proceedings. PG&E agrees for the reasons set forth in section V.B, below.

CalPA's Protest, at pages 8 – 9, proposes an alternative schedule, which PG&E addresses further below in Section V.

D. Protest of CALSSA

CALSSA's Protest notes (at page 3) that it has a strong interest in residential, commercial and industrial, as well as agricultural rate design, and PG&E's proposed cost of service methodology, all of which are in scope.

CALSSA's Protest further requests (at pages 2 – 3) that the CPUC consider topics of real-time pricing (RTP) and other advanced dynamic rates, and various demand charge reforms in this proceeding. CALSSA notes that RTP and other dynamic rate options were included in the scope of SDG&E's recent GRC Phase II Application (A.19-03-002). CALSSA also notes that the CPUC held a dynamic pricing workshop on October 15, 2019 in which multiple parties were asked to make presentations, with some parties expressing support for piloting dynamic pricing options for SDG&E customers. To the degree SDG&E may be ordered to pilot RTP or other advanced dynamic rate options, PG&E believes it may be advisable to await the results of such pilot, given that significant changes are already being rolled out for PG&E customers, such as new TOU rates with different peak hours. However, if this issue is deemed in scope for PG&E's GRC Phase II, it is difficult for PG&E to comment until it sees whatever proposal(s) CALSSA may include in its eventual testimony in this proceeding. PG&E notes that dynamic rates are also being considered in two other proceedings: 1) the CEC Load Management Rulemaking (Docket 19-OIR-01), in which a workshop on scope was held on January 14, 2020, with the Rulemaking scheduled to open in April 2020 and load management regulations finalized in November 2020, and 2) PG&E's Commercial EV (CEV) Rate Proceeding (A.18-11-003), in which D.19-10-055 orders PG&E to prepare and submit a proposal for an optional dynamic CEV rate no later than 12 months after the effective date of the decision (i.e., by October 2020). PG&E believes it will be important to consider the above-mentioned related proceedings as dynamic rates are considered in this GRC Phase II. CALSSA expresses no objection to PG&E's proposed schedule.

E. Protest of the Joint CCAs

The protest filed by the Joint CCAs notes that the Joint CCAs are still examining the Application but identifies a number of issues that impact its interests. All except one appear to fall within the marginal cost, revenue allocation and rate design issues set forth in PG&E's Application. PG&E will respond to the Joint CCAs' data requests related to the issues that are in scope, review MCE's ultimate responsive testimony on these issues, and reply through its rebuttal testimony.

The Joint CCAs' Protest (at pp. 5 – 7 and page 9 bullet 7), raises an issue about the presentation of the PCIA on bundled customers' bills.^{12/} As the Joint CCAs acknowledge, the issue of presenting the PCIA as a separate line item on bundled customers' bills was included in the Working Group process of Phase 2 of the PCIA OIR, specifically Issue 12 in Working Group One.^{13/} A decision on the co-leads' recommendations in the Final Report for Working Group One is still pending. If the CPUC determines that continuation of the working group process is appropriate, then the bill presentment issue should remain in Phase 2 of the PCIA OIR. However, if the CPUC decides that a ratesetting proceeding is now the appropriate venue to address this issue, PG&E is open to including the question of whether the PCIA should be shown on bundled bills in this 2020 GRC Phase II. That said, any bill presentment change of this nature would require a significant structural reprogramming of PG&E's billing system, both expanding the scope and cost of PG&E's IT proposals in its 2020 GRC Phase I. Therefore, PG&E would, in this proceeding, request a cost-recovery mechanism to track any costs related to implementing any such billing change for recovery from all retail customers.

^{12/} “What changes are needed to PG&E's rate design, tariffs *and billing processes* to make it easier for CCAs to be able to offer alternative generation rate designs and tariffs that accelerate achievement of local and state policy goals.” (Joint CCAs Protest p. 9, bullet 7.)

^{13/} The co-leads for Working Group One are PG&E and the California Community Choice Association (CalCCA), which represents the interests of 18 community choice electricity providers in California, including all of the Joint CCAs.

The Joint CCAs also suggest that certain NBCs should be time-differentiated.^{14/} PG&E cannot fully comment on this issue without a better understanding of the proposal suggested here. Certainly, some NBCs are not subject to change in this proceeding, while rate design for others *may* be within scope of a GRC Phase II. In either case, however, PG&E would be concerned about time-differentiating any NBC. By their very definition, these costs need to be paid by all customers. Time-differentiating an NBC will make it less non-bypassable for some customers than others, and shift revenue among customers. Because this would likely subvert the intent of making the rate non-bypassable, a TOU design for NBCs would be inappropriate.

F. Response of County of Santa Clara

CSC's Response suggests that its technical review of the application and testimony is still in the early stages, and notes that it has yet to engage in discovery. The sole matter CSC mentions as being of interest to it, relating to Phase II marginal cost, revenue allocation and rate design issues, is "RES-BCT^{15/} and related matters," including the "transition plan for rate changes for eligible grandfathered solar customers served under RES-BCT." (CSC Response, page 1.) PG&E confirms that it is not proposing in this proceeding to modify the RES-BCT transition plan adopted in D.18-08-013 and approved via Advice Letter 5379-E-A. RES-BCT rate issues would appear to fall within the scope of issues typically handled in a GRC Phase II proceeding. PG&E will respond to data requests as well as reply to any proposals of CSC through PG&E's Rebuttal testimony.

G. Response of DACC (Other than Reassignment of Distribution Costs)

DACC's Response notes that its primary interest in this proceeding is the calculation and rate treatment of costs that are charged to Direct Access (DA) customers. Other than issue of reassignment of some distribution costs to recovery in generation rates (which, as discussed in section I.B.2. above, PG&E believes should be found out-of-scope for a GRC Phase II), DACC's

^{14/} See Joint CCA Protest, p. 9, bullet 4: "Whether the modification of certain Non-Bypassable Charges (NBCs) to make them time-variant would better achieve state policy goals."

^{15/} Rate for Local Government Renewable Energy Self-Generation Bill Credit Transfer (RES-BCT).

Response (at pages 1 – 2) also specifically mentions several issues that appear to be within scope. Their in-scope issues include : (1) the correct determination of marginal customer and distribution costs, (2) the application of those marginal costs for revenue allocation purposes, (3) PG&E’s proposal to update its Schedule E-CREDIT for DA and fees for incremental costs related to providing service to DA and CCA customers, and (4) PG&E’s proposal to move collection of certain program costs from the distribution component of rates into the Public Purpose Program (PPP) rate component.

PG&E will respond to appropriate DACC data requests as well as to DACC’s proposals on in-scope issues through PG&E’s Rebuttal testimony.

H. Response of EPUC

EPUC’s Response generally identifies various marginal cost, revenue allocation and rate design issues (MMID Protest pages 2-3) that all appear to fall squarely within scope of issues PG&E already identified for this proceeding. PG&E will respond to EPUC’s data requests on the issues within scope and looks forward to reviewing EPUC’s testimony. PG&E will reply to EPUC’s proposals through Rebuttal testimony, in due course.

I. Protest of MMID

MMID’s joint protest (at page 2) generally identifies two rate design issues that fall squarely within scope of issues PG&E already identified for this proceeding. Specifically, as in the last GRC Phase II, MMID’s stated interests are in PG&E’s Economic Development Rate (EDR) and PG&E’s Schedule E-31 Distribution Bypass Deferral Rate proposals, primarily as they relate to cost-shifting and contribution to margin issues. These two rate proposals are clearly within the scope of the proceeding. PG&E will respond to MMID’s data requests on issues within this scope of this proceeding and looks forward to reviewing MMID’s testimony on these topics. PG&E will reply through its Rebuttal testimony, in due course.

J. Response of SBUA

SBUA’s Response, at page 3, generally appears to reference marginal cost, revenue allocation and rate design issues that fall squarely within scope of those already listed by PG&E

for consideration in this proceeding. SBUA expresses concern that “all of the outstanding issues and implications of the current situation faced by PG&E in its customers” be considered, and that the CPUC somehow avoid “siloing” this proceeding from the dockets focusing on PG&E’s bankruptcy proceeding, wildfire mitigation plan, PSPS impacts. SBUA does not propose how the CPUC should do so, however. PG&E is concerned about scope creep as well as getting a timely decision in this proceeding. It is uncertain whether the timing of the issuance of decisions in such other CPUC (and Bankruptcy Court) proceedings will happen in time for them to be considered in responsive and rebuttal testimony in this GRC Phase II proceeding.

PG&E will respond to SBUA’s data requests and looks forward to reviewing SBUA’s testimony on the issues deemed in scope for this proceeding. PG&E will reply to SBUA’s proposals through its Rebuttal testimony.

K. Response of SEIA

The issues raised in SEIA’s Response, at pages 3 – 5, appear to fall within the marginal cost, revenue allocation and rate design issues set forth in PG&E’s Application. SEIA attempts to pre-argue that the methodology for PG&E’s marginal cost of service analysis “distinguishing between NEM and non- NEM customers may not be meaningful.” (Response of SEIA at page 4.) SEIA does not question that this marginal cost issue is within the scope of a GRC Phase II. SEIA makes its comment that “[t]hus the distinction between a NEM and non-NEM customer may not be meaningful” before it has even served on or received from PG&E any data request responses on PG&E and is concerned that it may reflect a misunderstanding by SEIA of PG&E’s analysis. In fact, the cost of service methodologies used in PG&E’s 2020 GRC Phase II showing assigns costs and benefits appropriately to **“delivered” and “received” load**, as explained in PG&E’s testimony in Exhibit (PG&E-2). Thus, PG&E’s cost of service methodologies are appropriate for analyzing costs associated with a *variety* of load shapes that result from different combinations of “delivered” and “received” load profiles, and, therefore, are not limited to just NEM and storage, as SEIA implies. PG&E has estimated cost of service using all such customer load shapes that are observed in its electric portfolio and then used NEM and non-NEM grouping

to show how the cost of service differ between these two groups, as well as use those estimates in revenue allocation.

PG&E will respond to SEIA's data requests and looks forward to reviewing its testimony on this and other in-scope issues. If SEIA wants to propose an alternative methodology for analyzing the marginal costs of delivered load versus received load, it may do so. PG&E will reply to SBUA's proposals through its Rebuttal testimony.

SEIA also suggests (at page 6) that the schedule set forth in PG&E's Application may not allot adequate time for settlement discussions, which PG&E addresses below in section V.

L. Protest of TURN

TURN's Protest discusses various proposals in PG&E's Application on marginal cost, revenue allocation and rate design issues, which generally appear to fall within scope of a GRC Phase II proceeding. TURN's Protest (page 2) references PG&E's residential customer Essential Use Study proposal as an issue it intends to address but did not expressly address PG&E's procedural request that the CPUC establish an expedited, bifurcated track for the CPUC's consideration of Essential Use Study plans, either here or in another proceeding, such as the multi-utility Affordability OIR favored by CalPA. (See section V.B below.)

PG&E looks forward to responding to TURN's data requests on issues found to be within scope and will reply to TURN's proposals through PG&E's Rebuttal testimony.

III. PROPOSED CATEGORY

No party disagreed that this proceeding should be categorized as ratesetting.

However, PG&E notes that, if the Essential Use Study is bifurcated but *not* removed from this proceeding (rather than moving it to the Affordability OIR, as supported by CalPA, CforAT and PG&E), any bifurcated, expedited proceedings on this issue could be categorized separately as quasi-legislative, because it will establish general rules for categorizing costs but would not set actual rates.

IV. NEED FOR EVIDENTIARY HEARING

All parties agreed that an evidentiary hearing may be needed on the 2020 GRC Phase II issues, if the parties are unable to settle.

V. PROPOSED SCHEDULE

All parties other than CalPA and SEIA either agreed with PG&E's proposed schedule or did not object to it.

CalPA proposes a delay in the due date for CalPA's testimony to September 30, 2020, which would represent a two-month delay as compared with PG&E's proposed schedule, which calls for a CalPA's testimony to be served in late July 2020. PG&E's proposed schedule had already added about two (2) months to the interval called for in the Rate Case Plan, in recognition that PG&E would expect to serve its updated testimony in or about May 1, 2020. Under PG&E's already-elongated proposed schedule, CalPA would still have a full three (3) months to finalize its showing after receiving PG&E's expected May 1, 2020 Update Testimony. However, under CalPA's request for an additional delay of two months, CalPA's requested September 30, 2020 date is a full six (6) months later than the interval-based deadline called for in the CPUC's then-existing Rate Case Plan.^{16/} In other words, if CalPA's proposed delay is approved, CalPA would have had PG&E's initial opening testimony for a full ten (10) months, and PG&E's workpapers for over eight-and-a-half (8 ½) months.

By including an additional two-month delay for both the CalPA and Intervenor testimony (and the rest of the proceeding schedule), CalPA's alternative schedule seems likely to cause pancaking of the new PG&E GRC Phase II schedule directly on top of the likely schedule for SCE's GRC Phase II, scheduled to be filed on June 30, 2020.

SEIA suggests, without providing any specific schedule amendments, that the time PG&E (and CalPA) have allocated for settlement talks – two months) may not be enough. PG&E assumes that, as in the past, if settlement talks prove productive and more time is needed to bring discussions to fruition than has been targeted in this proposed schedule, the parties can

^{16/} D.89-01-040, the **Rate Case Plan Appendix B**, as modified by D.14-12-025.

request that the schedule be temporarily suspended, with status reports to be filed at certain milestones. However, PG&E respectfully requests that whatever schedule the CPUC adopts at this time not call for a final decision any later than Fall 2021. PG&E notes that the CPUC just adopted a new Rate Case Plan on January 16, 2020 (D.20-01-002). PG&E is concerned that preparation of its 2023 GRC Phase II showing cannot meaningfully begin until after it receives a final decision in this 2020 GRC Phase II, and receipt of a final 2020 GRC Phase II decision after Fall 2021 could jeopardize the timeliness of PG&E's next GRC Phase II Application.

PG&E presents below a comparison of these parties' alternative proposed schedules and looks forward to discussion with the parties on it, either before and certainly at the PHC:

Comparison of Parties' Alternative Proposals for Case Schedule

Events	PG&E's Proposed Schedule^{17/}	CalPA's Proposed Schedule	SEIA's Proposed Schedule
PG&E Application Filed	Nov. 22, 2019	Same	<i>[SEIA did not expressly comment on each date, but presumably agrees through Settlement discussions]</i>
Protests due	Jan. 10, 2020	Same	
PG&E Replies to Protests	Jan. 21, 2020	Same	
Prehearing Conference	<i>Jan. 23, 2020</i>	Same	
Scoping Memo Issued	Mid-Feb. 2020	To be determined by Assigned Commnr. and ALJ	
PG&E serves required update to exhibits (mostly to reflect updated sales forecast, but also to conform Mar Gen Costs with the IRP decision (D.19-11-016) and Final Reference System Plan	By May 1, 2020	Not expressly included in CalPA proposed schedule	

^{17/} Items in italics have been updated to reflect early dates that have become clear through CPUC Rules or Rulings since PG&E filed its Application on November 22, 2019.

Events	PG&E's Proposed Schedule ^{17/}	CalPA's Proposed Schedule	SEIA's Proposed Schedule
CalPA serves Responsive Testimony	Late July, 2020	Sept 30, 2020	
Intervenors serve Responsive Testimony	Late Aug., 2020	Oct. 28, 2020	
Settlement Discussions	Sept – Oct 2020	Nov 2020 – Jan. 2021	<i>SEIA questions whether a settlement discussion period of two months is adequate, without making a specific scheduling proposal</i>
All parties serve Rebuttal Testimony	Late Nov. 2020	Feb. 2021	
Evidentiary Hearings (if necessary)	Jan – Feb 2021	March 2021	
Concurrent Opening Briefs	Feb. 2021	April 2021	
Reply Briefs	March 2021	May 2021	
ALJ's Proposed Decision	June 2021	Aug. 2021	
Opening Comments on PD	July 2021	Sept. 2021	
Reply Comments on PD	July 2021	Sept. 2021	
Final decision	Aug, 2021	Oct. 2021	

A. Public Participation Hearings

CFBF recommends that the schedule include an opportunity for Public Participation Hearings (PPH). If the CPUC wishes to hold separate PPHs for PG&E's Phase II, PG&E does on a parallel path that would not require any change to the other dates (either those proposed by PG&E, or by CalPA).

B. Essential Use Study Venue and Timing

In compliance with the requirement in D.18-08-013, in Exhibit (PG&E-3), Chapter 9, PG&E submitted a plan for a residential electric EUS. PG&E proposed that the CPUC issue a ruling creating an expedited, bifurcated proceeding to consider the EUS plans for all three

investor-owned utilities (IOUs) at the same time. No party opposes the concept of an expedited bifurcated track to allow the CPUC to consider EUS planning issues as promptly as possible, however the various parties differ somewhat in their recommended solution.

CalPA’s Protest (at page 7) supports PG&E’s request to consolidate the three EUS plans into a separate track for consideration in the Affordability OIR (R.18-07-006), as this would be most efficient given that the IOUs’ EUS plans contain a similar scope of issues that should be reviewed and decided together. CalPA notes that consolidation would allow interested parties to participate in a single proceeding rather than needing to advocate for EUS issues in three separate IOU proceedings.

TURN’s Protest (page 2) merely referenced PG&E’s EUS proposal as an issue it intends to address but did not expressly address PG&E’s procedural request that the CPUC establish an expedited, bifurcated track for the CPUC’s consideration of EUS plans, either here or in another proceeding, such as the multi-utility Affordability OIR favored by CalPA.

CforAT’s Response (at pages 2 – 5) supports the concept put forward in PG&E’s application but states that it is “agnostic” with regard to the forum in which this EUS study (and the other utilities’ studies) are conducted. CforAT agrees with PG&E that there are benefits to a Joint EUS study (page 3). CforAT is more concerned with ensuring that the CPUC’s review move ahead as promptly as possible. CforAT identifies several options for proceeding and assesses each for its relative promptness:

Procedural Options for EUS	CforAT’s Comments	PG&E’s Response
1. Creating a New, Joint EUS Proceeding	Concerned it could cause a one- to two-month delay while CPUC paperwork is written up and served to create such a new proceeding (CforAT pages 3 - 4)	PG&E believes the CPUC could probably initiate a new Joint EUS proceeding fairly quickly. However, PG&E agrees that using the existing Affordability OIR would be about a month or so quicker.
2. House EUS in a new phase of the existing Affordability OIR (R.18-07-006)	Supports (pages 3 - 4).	Supports (as does CalPA). An amendment to the Affordability OIR’s Scoping

		Memo and Schedule could presumably be issued a week or two after guidance on this procedural issue is given here.
3. Create a separate expedited track within PG&E's 2020 GRC II	Supports (page 4)	Opposes (as does CalPA). PG&E believes that multi-utility rulemaking issues should generally not be decided in a single utility's ratemaking proceeding, such as this GRC, as it would require other IOUs and other parties like UCAN to intervene who otherwise would not participate here.
4. Create a separate expedited track within SCE's 2020 RDW (filed in December 2019 as A.19-12-008)	Although CforAT's Response to PG&E did not address this option, subsequent discussions with CforAT indicate that its Response to SCE's RDW allowed for this possibility (instead of using PG&E's GRC Phase II). SCE's RDW only involves 3 issues, one of which is SCE's EUS plan, making it much narrower than PG&E's 2020 GRC II, thus likely to be decided much sooner.	Generally, opposes using a single utility's proceeding to consider other IOUs' EUS plans, as discussed above. However, if the CPUC does not pursue Option 2, above (as recommended by PG&E and CalPA and supported by CforAT), PG&E agrees that, of the two available single-utility ratemaking proceedings, SCE's RDW is narrower and likely to result in a quicker decision.

PG&E appreciates CforAT and CalPA's thoughtful analyses, and respectfully requests that the CPUC adopt Option 2, above, to move the EUS issue to be housed in the existing multi-utility Affordability OIR, in a new, expedited EUS phase. This approach has the support of all parties whose filings addressed it and should achieve both the goals of facilitating expedited review as well as providing a joint proceeding in which all of the IOUs' EUS plans can be reviewed together, for consistency. The Affordability OIR's Assigned Commissioner's Amended Scoping Memo and Ruling, adopted November 8, 2019, should be amended accordingly, building from the schedule presented by PG&E in Attachment A to Chapter 9, at page 9-AtchA- 13.

VI. CONCLUSION

PG&E respectfully requests that the ALJ and Assigned Commissioner adopt a Scoping Memo and Schedule consistent with PG&E's Application and its reply comments above.

Although time is tight before the January 23, 2020 10:30 am Pre-Hearing Conference (PHC), PG&E welcomes discussions about scheduling alternatives, not only with CalPA and SEIA, but with any other interested parties who contacts PG&E. If a mutually agreeable compromise schedule emerges from such discussions before the PHC, PG&E will share it with the service list.

Respectfully submitted,

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